

STEVEN H. GURNEE, ESQ. SB# 66056
 DAVID M. DANIELS, ESQ. SB# 170315
 NICHOLAS P. FORESTIERE, SB# 125118
 GURNEE & DANIELS LLP
 2240 Douglas Boulevard, Suite 150
 Roseville, CA 95661-3805
 Telephone (916) 797-3100
 Facsimile (916) 797-3131

Attorneys for Defendants
 ALDERWOODS GROUP, INC., PAUL HOUSTON
 SERVICE CORPORATION INTERNATIONAL,
 SCI FUNERAL AND CEMETERY PURCHASING
 COOPERATIVE, INC., SCI EASTERN MARKET
 SUPPORT CENTER, L.P., SCI WESTERN MARKET
 SUPPORT CENTER, L.P., and SCI HOUSTON
 MARKET SUPPORT CENTER, L.P.

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

WILLIAM HELM, DEBORAH PRISE,) No. CV 08-01184 SI
 HEATHER P. RADY, et al., on behalf of)
 themselves and all other employees and former)
 employees similarly situated,)

Plaintiffs,)

vs.)

ALDERWOODS GROUP, INC., PAUL A.)
 HOUSTON, SERVICE CORPORATION)
 INTERNATIONAL, SCI FUNERAL AND)
 CEMETERY PURCHASING)
 COOPERATIVE, INC., SCI EASTERN)
 MARKET SUPPORT CENTER, L.P., SCI)
 WESTERN MARKET SUPPORT CENTER,)
 L.P., a/k/a SCI WESTERN MARKET)
 SUPPORT CENTER, INC., and SCI)
 HOUSTON MARKET SUPPORT CENTER,)
 L.P.)

Defendants.)

**[PROPOSED] ORDER PERMITTING
 WITHDRAWAL OF DEFENDANTS'
 MOTIONS TO STAY AND DISMISS
 ACTION PENDING FURTHER
 PERSONAL JURISDICTION
 DISCOVERY**

**[PROPOSED] ORDER PERMITTING WITHDRAWAL OF DEFENDANTS' MOTIONS
 TO STAY AND DISMISS**

Case No.: CV 08-01184 SI

1 Pursuant to the Stipulation of counsel and good cause appearing, Defendants shall withdraw
2 their Motions to Stay and Motions to Dismiss (Docket Nos. 95, 99, 106 and 109), without
3 prejudice to re-file them at a later date to be determined by the Court pursuant to a schedule for
4 completion of personal jurisdiction discovery and for hearing Defendants Motions to Stay and
5 Dismiss, which will be established by the Court at the time of the March 20, 2009 hearing on
6 Plaintiffs' anticipated Motion to Compel. Plaintiffs shall not attempt to take the defaults of any of
7 the Defendants in this matter as a result of their withdrawal of the above-referenced Motion to Stay
8 and Motions to Dismiss.
9

10 **IT IS SO ORDERED.**
11

12
13 Dated: _____
14



15 Honorable Susan Illston
16 United States District Court
17
18
19
20
21
22
23
24
25
26
27
28

**[PROPOSED] ORDER PERMITTING WITHDRAWAL OF DEFENDANTS' MOTIONS
TO STAY AND DISMISS**

Case No.: CV 08-01184 SI